UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA GAINESVILLE DIVISION

WAYNE DOUGLAS COBB, as Co-Administrator of the Estate of Jennifer Autumn Cobb, deceased, and SUSAN MOON COBB, as Co-Administrator of the Estate of Jennifer Autumn Cobb,

Plaintiffs,

CIVIL ACTION FILE NO.: 2:23-CV-130-SCJ

v.

JEREMY "BOB" GREEN and YOUNG MEN'S CHRISTIAN ASSOCIATION OF GEORGIA'S PIEDMONT, INC.,

Defendants.

<u>DEFENDANT JEREMY GREEN'S REPORT REGARDING CRIMINAL</u> <u>MATTER AND MOTION TO CONTINUE STAY</u>

In accordance with this Court's order entered on July 17, 2024 [Doc. 105], Defendant Jeremy Green submits his status report regarding the criminal action pending against him in the case styled *State of Georgia v. Jeremy Green*, Case Number 21HR00303, Superior Court of Hart County, State of Georgia, and requests the Court to continue the stay for an additional 120 days for the reasons set forth below.

Plaintiffs have sued the Defendants over, *inter alia*, alleged incidents of sexual misconduct by Green against Jennifer Autumn Cobb. [Doc. 23]. The criminal case against Green remains pending and, as of the date of this filing, there are myriad pretrial motions that remain unresolved and for which, to the extent necessary, no date for oral hearing has been scheduled. To the best of his attorneys' knowledge, the unresolved motions are as follows: motion for change of venue, as amended; motion *in limine* for out of court statements by Jennifer Cobb, as amended; *motion in limine* to exclude the forensic interview and testimony of the forensic interviewer; *motion in limine* to exclude the opinions of Susan Cobb; motion for individual voir dire; and motion for juror questionnaire.

Based upon communications with Green's counsel in the criminal matter, the trial of the case continues to be delayed until the Court rules on the motions described above. Some of these motions concern evidentiary issues that are very likely to arise in this action. Accordingly, and for the reasons stated above¹, Green respectfully requests that the Court continue the stay of discovery as to Green only for an additional 120 days subject to the same reporting requirements. A proposed order

¹ Green incorporates by reference all facts, arguments, and citations to authority set forth in his original motion to stay, and brief in support thereof, as if fully set forth herein. [Doc. 13; 13-1]. Furthermore, Green is amenable to a scheduling conference at the Court's convenience prior to the end of the current stay. [Doc. 105].

granting the instant motion is filed separately for the Court's consideration.

Respectfully submitted this 17th day of October, 2024.

SWIFT, CURRIE, McGHEE & HIERS, LLP

/s/ Jon D. Stewart, Jr.

Jon D. Stewart, Jr. Georgia Bar No. 681555

Attorney for Defendant Jeremy Green

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/s/William Brent Ney
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Attorney for Defendant Jeremy Green

CERTIFICATE UNDER L.R.7.1D

Pursuant to Northern District of Georgia Local Rule 7.1D, the undersigned counsel for Defendant Jeremy Green certifies that the foregoing

<u>MATTER AND MOTION TO CONTINUE STAY</u> is a computer document

prepared in Times New Roman (14 point) font in accordance with Local Rule 5.1.

Respectfully submitted this 17th day of October, 2024.

/s/ Jon D. Stewart, Jr.

Jon D. Stewart, Jr. Georgia Bar No. 681555

Attorney for Defendant Jeremy Green

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and

foregoing **DEFENDANT JEREMY GREEN'S REPORT REGARDING**

CRIMINAL MATTER AND MOTION TO CONTINUE STAY upon all parties to

this matter by PACER and by email to the counsel of record as follows:

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Respectfully submitted this 17th day of October, 2024.

/s/ Jon D. Stewart, Jr.

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